

Sharing Faith Ministries
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Received & Inspected
FEB 05 2013
FCC Mail Room



Office of the Secretary
Federal Communication Commission
CGB Room 3-B431
445 12th Street, SW Room TW-A325
Washington, DC 20554

16 06-181

January 25, 2013

Reference: CGB-CC-1253 (*Your Sunday Worship*)

On January 24, 2013 I received a copy of an opinion presented by the Institute for Public Representation that had been requested by the FCC. This letter is in response to the items that related to Sharing Faith Ministries and our weekly television broadcast; *Your Sunday Worship*.

Page 2 states that each petition fails to demonstrate economical burden. I strongly disagree with this statement. I have provided to the FCC an entire year of bank statements for Sharing Faith Ministries as well as the billing invoices for expenses associated with the broadcast. The figures clearly show that we are operating at a lost. Unless our financial statements and billing invoices were disregarded from consideration during their evaluation, it is unimaginable how anyone cannot see mathematically that closed captioning would be financially burdensome.

Page 5 states that Sharing Faith Ministries did not seek individualized estimates. True, we did not call several vendors who provide this service to request that they send a bid for our show. Instead we researched how much this service typically costs given our parameters. When companies list the price for product or services on their websites there is no need to ask them to submit bids. Only when companies do not advertise their rates is it necessary to ask for individualized bids. This was not the case.

Page 8 states that Sharing Faith Ministries did not "appear" to offer a tenable explanation of how we are able to shoulder the ongoing cost of creating & distributing our broadcast and not the cost of closed captioning. First we must question the phrase "did not appear". We provided bank statements and billing invoices. So, we must conclude that the underlying thought is that our documentation is not being regarded as authentic. I assure you that Sharing Faith Ministries is not seeking to present a false reality.

Secondly, we must resist the notion of a "tenable explanation". We've explained several times that our ministry is small and donations have never been excessive. This weekly broadcast was originally envisioned to bring encouragement, hope and faith in Jesus Christ to the homebound. To that end, I have personally used our family savings to shoulder the ongoing cost of airing this

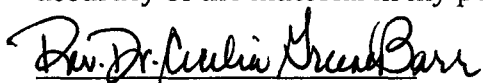
broadcast. Furthermore, each week I personally work in excess of 60 hours per week to include the creating and distributing this broadcast. The tenable explanation I have is that my faith teaches the importance of sowing and reaping. Each week our family sacrifices so that the gospel can be spread. Furthermore, each week I sacrifice and labor to produce a broadcast. Closed captioning is not the ONLY thing we are not able to do. We are not able to hire staff to edit and we are not able to hire staff to record. We are in a season of sowing, and the financial burden is far beyond what the ministry able to bear.

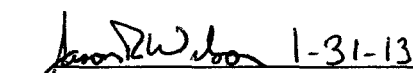
Page 8 states that Sharing Faith Ministries failed to provide relevant financial information for an affiliated entity; Smith Chapel AME Church. It also states that *Your Sunday Worship* "appears" to be under the direct control of Smith Chapel AME Church. Of all the statements in this document none could more incorrect than this faulty conclusion. I am the Pastor of Smith Chapel African Methodist Episcopal Church. I have been the Pastor of this 88 year old church for the past 3 years. I am appointed by the Presiding Bishop at our annual conferences. I am also the Founder of Sharing Faith Ministries that was established in 1999. Sharing Faith Ministries is the sole entity that provides the ministry of the *Your Sunday Worship* broadcast. Each Sunday I preach at my pastoral appointment and some Sundays I preach at other churches. *Your Sunday Worship* is a ministry of me preaching the gospel whether it is from the pulpit of Smith Chapel or any other church. Smith Chapel does not control any element of Sharing Faith Ministries therefore the financial information of the church has no bearing on our petition for exemption. Smith Chapel does benefit from the broadcast in that it becomes a way to encourage the growth of our congregation in that I am consistently inviting people to attend the worship experiences. This is why a YouTube clip of me preaching is on the church website. As the Pastor I want our church to increase in membership. Of course I could chose to NEVER mention that I am the Pastor of Smith Chapel but that would not make any gospel sense. Therefore I believe that the Commission has no cause to pull Smith Chapel into the review of our request for exemption. Again, let me state clearly, *Your Sunday Worship* is not funded nor "controlled" by Smith Chapel as stated on page 9.

Page 11 states that we incorrectly argue Rule 79.1(d)(11). It may be correct that we have not argued the Rule accurately to the law. We are not lawyers so this may be true. Let me state our argument without misstating the Rule. Sharing Faith Ministries has not generated enough income or donations to cover the cost of closed captioning or even our operating expenses to air the weekly broadcast; *Your Sunday Worship*. Requiring closed captioning presents an undue financial burden.

In conclusion, Sharing Faith Ministries requests exemption from closed captioning based upon the fact that it would be economically burdensome for us to provide this service. We have provided all financial documents to demonstrate these facts. My faith and commitment has carried us thus far but my family does not have any more money to give and I don't believe the spirit of the closed captioning requirement is intended to exhaust personal funds.

This written sworn statement is made under oath before an official. I attest to the truthfulness and accuracy of the material in my petition.


Rev. Dr. Cecelia GreeneBarr

 1-31-13
Witness

